

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
FIELDWOOD ENERGY LLC, et al.¹	§	Case No. 20-33948 (MI)
Debtors.	§	(Jointly Administered)
	§	

**ASPEN AMERICAN INSURANCE COMPANY, BERKLEY INSURANCE COMPANY,
EVEREST REINSURANCE COMPANY, AND SIRIUS AMERICA INSURANCE
COMPANY'S (I) OBJECTION TO DEBTORS' SECOND MOTION FOR ENTRY
OF AN ORDER FURTHER EXTENDING EXCLUSIVE PERIODS PURSUANT TO
SECTION 1121(d) OF BANKRUPTCY CODE AND (II) JOINDER TO (A) OBJECTION
OF XTO OFFSHORE, INC., HHE ENERGY COMPANY, AND XH LLC TO DEBTORS'
SECOND MOTION FOR ENTRY OF AN ORDER FURTHER EXTENDING
EXCLUSIVE PERIODS PURSUANT TO SECTION 1121(d) OF BANKRUPTCY
CODE AND (B) OBJECTION OF ENI PETROLEUM US LLC AND ENI US
OPERATING CO. INC. TO DEBTORS' SECOND MOTION FOR ENTRY
OF AN ORDER FURTHER EXTENDING EXCLUSIVE PERIODS
PURSUANT TO SECTION 1121(d) OF THE BANKRUPTCY CODE**

(Relates to Doc Nos. 930, 1091, and 1093)

Aspen American Insurance Company, Berkley Insurance Company, Everest Reinsurance Company, and Sirius America Insurance Company (collectively, the “**Sureties**”), by and through their undersigned counsel, hereby object to the *Debtors’ Motion for Entry of an Order Further Extending Exclusive Periods Pursuant to Section 1121(d) of Bankruptcy Code* [Docket No. 930] (the “**Debtors’ Motion**”) and join in (the “**Joinder**”) the *Objection of XTO Offshore, Inc., HHE Energy Company, and XH LLC to Debtors’ Second Motion for Entry of an Order Further*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

Extending Exclusive Periods Pursuant to Section 1121(d) of Bankruptcy Code [Docket No. 1091] and Objection of ENI Petroleum US LLC and ENI US Operating Co. Inc. to Debtors' Second Motion for Entry of an Order Further Extending Exclusive Periods Pursuant to Section 1121(d) of the Bankruptcy Code [Docket No. 1093] (collectively, the “**Objections**”) for the reasons set forth therein. In support thereof, the Sureties would respectfully submit as follows:

1. The Sureties hereby join the Objections verbatim as if fully set forth herein.
2. The Sureties hereby reserve the right to raise such other and further objections, and/or to join in any additional objections with respect to the Debtors’ Motion at any time prior to a final hearing on the Debtors’ Motion.
3. The Sureties further reserve all rights with respect to these bankruptcy cases, all rights under any bonds, contracts, and indemnity agreements, and all rights with respect to any claims they may assert or have asserted in these cases, including, but not limited to, administrative priority claims that may arise and all other rights in these cases.
4. For the reasons set forth herein and in the Objections, the Sureties hereby request the entry of an order denying the relief requested in the Debtors’ Motion and granting them such other and further relief, both at law and in equity, to which they may justly be entitled.

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DATED: March 24, 2021.

Respectfully submitted,

HUSCH BLACKWELL LLP

By: /s/ Timothy A. Million

Randall A. Rios
State Bar No. 16935865
Timothy A. Million
State Bar No. 24051055
600 Travis, Suite 2350
Houston, Texas 77002
Tel: 713-525-6226
Fax: 713-647-6884
Email: randy.rios@huschblackwell.com
Email: tim.million@huschblackwell.com

**CO-COUNSEL FOR ASPEN AMERICAN
INSURANCE COMPANY, BERKLEY
INSURANCE COMPANY, EVEREST
REINSURANCE COMPANY AND SIRIUS
AMERICA INSURANCE COMPANY**

-AND-

Armen Shahinian, Esq. (admitted *pro hac vice*)
(ashahinian@csglaw.com)
Scott A. Zuber, Esq. (admitted *pro hac vice*)
(szuber@csglaw.com)
Darren Grzyb, Esq. (admitted *pro hac vice*)
(dgrzyb@csglaw.com)
Terri Jane Freedman, Esq. (admitted *pro hac vice*)
(tfreedman@csglaw.com)

Chiesa Shahinian & Giantomaso PC
One Boland Drive
West Orange New Jersey 07052

**ATTORNEYS FOR ASPEN AMERICAN
INSURANCE COMPANY, BERKLEY
INSURANCE COMPANY, EVEREST
REINSURANCE COMPANY AND SIRIUS
AMERICA INSURANCE COMPANY**

CERTIFICATE OF SERVICE

I certify that on March 24, 2021, a true and correct copy of the foregoing document was served upon all parties receiving electronic notice *via* the Court's ECF/CM filing and notification system.

/s/ *Timothy A. Million*